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**From:** Pierce, Jennifer [pierce.jennifer@epa.gov]  
**Sent:** 9/10/2020 3:14:24 PM  
**To:** Garnett, Desean [Garnett.Desean@epa.gov]  
**Subject:** FW: EPA's Request for Confidential Business Information Substantiation  
**Attachments:** sample program recommendation.doc

FYI

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**From:** Leon, Sandra <Leon.Sandra@epa.gov>  
**Sent:** Friday, September 4, 2020 11:47 AM  
**To:** Ho, Yenhung <Ho.Yenhung@epa.gov>; Pierce, Jennifer <pierce.jennifer@epa.gov>  
**Subject:** RE: EPA's Request for Confidential Business Information Substantiation

Hi Calvin,

Your office will need to review (I assume it is you who will have to do this) and determine if the information claimed as confidential is indeed confidential information. You will need to send a memo to Jenny that includes your analysis and conclusion. Jenny will rely heavily on the Program's opinion when she is putting together the decision for Sylvia's signature. I have attached an example of a memo put together by a program office. Sorry it is a bit dated and on a different subject but hopefully it is still helpful.

Sandra Leon  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street, M/S ORC-2  
San Francisco, CA 94105  
Telephone: (415) 972-3878  
Fax: (415) 947-3570

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**From:** Ho, Yenhung <Ho.Yenhung@epa.gov>  
**Sent:** Friday, September 4, 2020 9:39 AM  
**To:** Pierce, Jennifer <pierce.jennifer@epa.gov>; Leon, Sandra <Leon.Sandra@epa.gov>  
**Subject:** FW: EPA's Request for Confidential Business Information Substantiation

Hi Jenny and Sandy,

Attached are SEI's response to our CBI substantiation request.

Any suggestions on how to review this type of response and/or make CBI determination?

Thanks,  
Calvin

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**From:** Julie Hardie <jhardie@seismicexchange.com>  
**Sent:** Thursday, September 3, 2020 12:58 PM  
**To:** Ho, Yenhung <Ho.Yenhung@epa.gov>; Albright, David <Albright.David@epa.gov>  
**Cc:** Rebecca Hollis <rhollis@cleanenergysystems.com>; Christine Kujawa <ckujawa@seismicexchange.com>  
**Subject:** RE: EPA's Request for Confidential Business Information Substantiation

Calvin and David,

Attached please find a letter, along with 3 attachments referenced therein, that are responsive to your Substantiation Request re Confidential Business Information submitted to the EPA by Clean Energy Systems. Please let me know if you have any questions or concerns.

Best Regards,  
Julie

*Julie Kay Hardie*

Seismic Exchange, Inc.  
4805 Westway Park Blvd  
Houston, Texas 77041  
Direct Line: 832-590-5206  
Mobile: 713-253-3083  
Main: 832-590-5100  
Facsimile: 832-590-5296  
Email: [jhardie@seismicexchange.com](mailto:jhardie@seismicexchange.com)

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**From:** Ho, Yenhung <[Ho.Yenhung@epa.gov](mailto:Ho.Yenhung@epa.gov)>  
**Sent:** Friday, August 14, 2020 4:57 PM  
**To:** Julie Hardie <[jhardie@seismicexchange.com](mailto:jhardie@seismicexchange.com)>  
**Cc:** Rebecca Hollis <[rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com)>; Pierce, Jennifer <[pierce.jennifer@epa.gov](mailto:pierce.jennifer@epa.gov)>  
**Subject:** EPA's Request for Confidential Business Information Substantiation

\*\*\* External Email \*\*\*

Dear Ms. Hardie:

Attached is a request for confidential business information substantiation regarding the seismic data from Seismic Exchange Incorporated that was used in Clean Energy Systems' Underground Injection Control Class VI Pre-construction permit application.

Please confirm receipt of this request and let us know if you have questions about the request.

Sincerely,

Calvin Ho  
Groundwater Protection Section  
Water Division (WTR-4-2)  
U.S. EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105  
415-972-3262